

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:21-cr-141
)	
v.)	18 U.S.C. § 371
)	Conspiracy to Make False Statements in
)	Connection with Firearms Transactions
)	(Count 1)
KEVIN ANDREW STATON, JR.,)	
)	18 U.S.C. §§ 922(a)(6) & 924(a)(2)
Defendant.)	False Statement During Purchase of Firearm
)	(Count 2)
)	
)	18 U.S.C. § 924(d)
)	28 U.S.C. § 2461(c)
)	Criminal Forfeiture

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

From in or about June 2019 to in or about June 2020, within the Eastern District of Virginia and elsewhere, the defendant, KEVIN ANDREW STATON, JR., did knowingly and willfully conspire and agree with other persons both known and unknown to commit offenses against the United States, that is, to acquire firearms as a straw purchaser, by knowingly making false statements and representations with respect to the information required to be kept in the records of federally licensed firearms dealers in connection with the sale of firearms, and in furtherance of said conspiracy, KEVIN ANDREW STATON, JR., falsely represented to such firearms dealers that he was the actual transferee or buyer of forty-five (45) firearms that he was truly purchasing on behalf of known and unknown co-conspirators, in violation of Title 18, United States Code,

Sections 922(a)(6) and 924(a)(1)(a).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia, namely the purchase of the forty-five (45) firearms listed in the below chart. For each purchase, KEVIN ANDREW STATON, JR., falsely completed an ATF Form 4473 indicating he was the true purchaser.

	Date of Purchase	Location of Purchase	Firearm Description	Serial #
1	6/6/2019	Dicks Sporting Goods, Chesapeake, Virginia	Smith and Wesson, SD40 VE	FBL1059
2	6/20/2019	Bob's Gun Shop, Norfolk, Virginia (hereinafter "Bob's Gun Shop")	Mossberg 715P 22 LR	ETB4354084
3	6/27/2019	Bob's Gun Shop	American Tactical, Omni Hybrid	NS211732
4	8/6/2019	Bob's Gun Shop	American Tactical, Omni Hybrid	NS217169
5	8/17/2019	Chesapeake Pawn and Gun, Chesapeake Virginia (hereinafter "Chesapeake Pawn and Gun")	Taurus G2C	TMD51432
6	9/20/2019	Chesapeake Pawn and Gun	Taurus G2C	TMT60491
7	9/25/2019	Chesapeake Pawn and Gun	Taurus G2C	TMD62659
8	10/11/2019	Chesapeake Pawn and Gun	Glock 23, GEN4	BAE0066
9	10/26/2019	Chesapeake Pawn and Gun	Taurus G2C	TMD49511
10	11/9/2019	Chesapeake Pawn and Gun	Taurus G2C	TMD49190
11	11/13/2019	Chesapeake Pawn and Gun	Glock 23, GEN4	BDNP393

12	12/10/2019	Chesapeake Pawn and Gun	Glock 23, GEN4	RFE831
13	12/14/2019	Bob's Gun Shop	Century NAK97	RONVMB71941807
14	1/9/2020	Chesapeake Pawn and Gun	Taurus G2C	SMU15283
15	1/24/2020	Chesapeake Pawn and Gun	Glock 19, GEN3	NYA656
16	1/30/2020	Chesapeake Pawn and Gun	Springfield XD9 Defender	AT191002
17	2/8/2020	Bob's Gun Shop	Riley Defense, RAK	B01695
18	2/21/2020	Chesapeake Pawn and Gun	Taurus G2C	TMA96947
19	2/21/2020	Chesapeake Pawn and Gun	Taurus G2C	AAM107678
20	2/21/2020	Chesapeake Pawn and Gun	Charles Daily HONCHO	18PU2001170
21	3/31/2020	Bob's Gun Shop	Glock 22, GEN440	XHW278
22	4/11/2020	Bob's Gun Shop	SCCY CPX2	880836
23	4/11/2020	Bob's Gun Shop	SCCY CPX2	880835
24	4/16/2020	Bob's Gun Shop	Glock 23, GEN4	TVD214
25	4/22/2020	Bob's Gun Shop	Glock 23, GEN4	TVD351
26	4/22/2020	Bob's Gun Shop	Glock 31, GEN3	GEX943
27	4/24/2020	Bob's Gun Shop	Glock 21	GSH322
28	4/24/2020	Bob's Gun Shop	Glock 23	VCR386
29	5/7/2020	Bob's Gun Shop	Glock 31	GEX925
30	5/7/2020	Bob's Gun Shop	Glock 31	GEX959
31	5/7/2020	Bob's Gun Shop	Glock 21, GEN3	HGZ443
32	5/7/2020	Bob's Gun Shop	Springfield XD-40	US475552
33	5/15/2020	Superior Pawn and Gun, Virginia Beach, Virginia (hereinafter "Superior Pawn and Gun")	Glock 32	WFS942
34	5/15/2020	Superior Pawn and Gun	Century Arms C39V2	C29P2A04767
35	5/19/2020	Bob's Gun Shop	Smith and Wesson 4006TSW	BDJ4468
36	5/20/2020	Superior Pawn and Gun	Glock 22	HBC868
37	5/20/2020	Superior Pawn and Gun	Glock 27 GEN4	BMTR895

38	5/23/2020	DOA Arms, Virginia Beach, Virginia (hereinafter "DOA Arms")	Canik TP-9SF	20AT07553
39	5/23/2020	DOA Arms	Glock G29	BMVP117
40	5/24/2020	Superior Pawn, Norfolk, Virginia	Springfield Armory XD545	HG144538
41	5/26/2020	Bob's Gun Shop	FN America 509	GKS0063017
42	5/26/2020	Superior Pawn and Gun	Century Arms Micro Draco	PMD-19665-20
43	6/2/2020	DOA Arms,	Smith and Wesson M&P9EZ	NEY7725
44	6/2/2020	DOA Arms	Springfield Amory XDE	HE101807
45	6/2/2020	DOA Arms	Glock G23	AELR282

(All in violation of Title 18, United States Code, Section 371).

COUNT TWO

On or about the 13th day of November 2019, in the Eastern District of Virginia, the defendant, KEVIN ANDREW STATON, JR., in connection with the acquisition of a firearm, Glock, Model 23, .40 caliber semi-automatic pistol, serial number BDNP393 from Chesapeake Pawn and Gun, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Chesapeake Pawn and Gun, which statement was intended and likely to deceive Chesapeake Pawn and Gun, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented he was the actual transferee or buyer of the firearm listed on ATF form 4473.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).)

CRIMINAL FORFEITURE

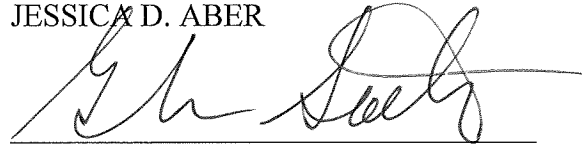
1. The defendant, if convicted of any of the violations alleged in this criminal information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).)

UNITED STATES ATTORNEY
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